

September 21, 2022

Mr. Anthony Hood
Chairman
DC Zoning Commission
441 4th Street, NW, Suite 200S
Washington, DC 20001

RE: Public Roundtable on Zoning Case 22-RT1: Racial Equity Analysis Tool

Dear Chairman Hood and members of the Commission:

Please accept this letter on behalf of the Coalition for Smarter Growth (CSG). CSG is the leading non-profit organization in the Washington, D.C. region, based in the District of Columbia, dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We are pleased to offer our comments on the work of the Zoning Commission in order to implement the directive from the updated Comprehensive Plan that requires that all zoning actions be viewed through a racial equity lens. This approach is one of the important advances of the Comprehensive Plan. We have discussed the Zoning Commission's proposals with our partners in the Housing Priorities Coalition, which worked together to win a Comprehensive Plan to guide us to a more equitable, affordable, and sustainable District.

We would like to start by re-stating the guidance from the Comprehensive Plan that provides the context for our application of a racial equity lens to zoning actions (from the Implementation Element):

Throughout the Comprehensive Plan elements, the term "racial equity lens" is used for activities ranging from preparing small area plans to evaluating development decisions. The intent is for District agencies to develop processes and tools tailored to various programs, activities, and decisions, that center and account for the needs of residents of color, to achieve these outcomes:

- Identify and consider past and current systemic racial inequities;
- Identify who benefits or is burdened from a decision;
- Disaggregate data by race, and analyze data considering different impacts and outcomes by race; and
- Evaluate the program, activity or decisions to identify measures, such as policies, plans, or requirements, that reduce systemic racial inequities, eliminate race as a predictor of results, and promote equitable development outcomes. 2501.4

We have already started working with the framework of a racial equity lens as proposed by the Comprehensive Plan and the Zoning Commission when considering the merits of Planned Unit Developments. In addition, we have the benefit of newly completed planning efforts, such as the [Chevy Chase Small Area Plan](#). This plan provided a brief historical context and

racially-disaggregated data, which demonstrated clear inequity by race and acknowledgement of the legacy of racial discrimination, specifically against African Americans, in Chevy Chase and the District. This context will be helpful for when the Commission considered future zoning actions in this area.

We wish to provide some comments regarding the questions that the Zoning Commission should pose in a zoning action. The questions posed in Part 2 of the tool is a good starting point - “What are the anticipated positive and negative impacts and/or outcomes of the zoning action? May include the following themes and any others that also apply:” Below, we provide additional comments responding to the themes proposed in the table.

| Theme | Original | Comments/additional details |
|---------------------|--|--|
| Direct Displacement | Will the zoning action result in displacement of tenants or residents? | How does the action avoid displacement? Describe the demographics, race, income and other characteristics of affected residents. What is the relocation program? What best practices model(s) does it follow? How does a relocation program specifically address the needs of Black and other people of color, or other specific needs of the residents? Is the right to return guaranteed? How are relocation costs covered? Is this temporary or permanent displacement? |
| Housing | Will action result in changes to: Market rate housing? Affordable housing? Replacement Housing? | Describe the affordable housing component. How does it address housing needs for households at or below 30% MFI, 40% MFI, 50% MFI and 60% MFI? What are the current and projected household size/age-related housing needs and proposed housing types in the project? Is the affordable housing rental and/or ownership? How does the new housing address housing needs in the local neighborhood and on a larger/citywide scale? How does the project address ongoing or potential displacement of residents from the neighborhood? For affordable rental housing: what is the management approach to provide a high quality of living as a part of this development for all residents? What social services are being evaluated for tenants that might need additional supports? For affordable ownership: what are the supports to help homeowners be successful in accessing and maintaining their homes? Addressing historic exclusion: how would proposed new housing address historic racial and other exclusion practices? Transportation equity: Low income residents and |

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| | | residents of color are less likely to own their own vehicle and thus take advantage of parking-only transportation benefits and provisions. Does the project offer an equitable transportation subsidy or subsidize vehicle parking but not offer an equivalent subsidy for residents who do not own personal vehicles? |
| Physical | Will the action result in changes to the physical environment such as: Public space improvements? Infrastructure Improvements? Art and culture? Environmental changes? Streetscape improvements? | How would public space, infrastructure, arts and culture, environmental, and streetscape changes welcome, address the needs of, and reflect new and existing residents, especially people of color, and vulnerable people such as older adults, young children. |
| Access to Opportunity | Job training/creation? Healthcare? Additional retail/access to new services? | How will training, education, healthcare, retail and other services access be improved for people of color who are current and future residents? How were priority needs for vulnerable and residents of color identified? |

We appreciate that this is an evolving process as we learn best how to apply a racial equity lens to zoning decisions, and all land use planning decisions. We look forward to staying involved in these discussions as we build a District that acts to: “reduce systemic racial inequities, eliminate race as a predictor of results, and promote equitable development outcomes” 2501.4.

Thank you for your consideration.

Sincerely,

Cheryl Cort
Policy Director